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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON DC 20554-0001

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IN THE MATTER OF:

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

BIENNIAL REGULATORY REVIEW – AMENDMENT OF PARTS 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95, 97, AND 101 OF THE COMMISSION'S RULES TO FACILITATE THE DEVELOPMENT AND USE OF THE UNIVERSAL LICENSING SYSTEM IN THE WIRELESS TELECOMMUNICATIONS SERVICES

WT DOCKET No. 98-20

REPLY COMMENTS OF

NATIONAL SPECTRUM MANAGERS ASSOCIATION ON THE NOTICE OF PROPOSED RULEMAKING

The National Spectrum Managers Association [NSMA] respectfully submits the following Reply Comments in the above-captioned proceeding.

The NSMA, established in 1984, is a voluntary organization made up of individuals who serve as microwave radio/wireless and satellite frequency coordinators, licensees, and manufacturers. The role of the Association is to supplement the Commission's coordination rules with procedural and technical recommendations developed in an open industry forum of coordinators, licensees, and manufacturers. The NSMA's objective is to make the frequency coordination process more efficient and effective.

In light of this desire to improve the coordination efforts and the resulting improvement in spectrum utilization, the NSMA has a number of concerns with respect to the Comments that were filed in this proceeding.

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Frequency Coordination for Minor Amendments

Our greatest concern relates to several commenters who indicated that the requirement for frequency coordination of Point-to-Point Microwave stations should be eliminated in the case of minor amendments. For example, Nextel Communications Inc., on page 6 of their Comments, proposes that frequency coordination only be required for major technical amendments and modifications.

The requirement to conduct frequency coordination notifications for a change in any of the technical parameters, whether major or minor, is needed to ensure interference-free operation and maximum spectrum utilization. A change of even one second in latitude or longitude could have significant effects on the interference environment in the case of a short microwave path or in the case of a station located relatively close to another station. In both of these cases, the one second change could result in a significant change in azimuth of the desired or interference path. Frequency coordination will allow for both the determination of non-interference as well as the ability to maintain an accurate data base for both interference protection and utilization of new paths.

The NSMA is not concerned with the application filing procedure as such, but only with the necessity of frequency coordination for <u>any</u> change which might affect the interference environment.

Area Wide Licensing

Teligent, Inc. comments that area wide licensing should be established for Digital Electronic Message Service [DEMS] stations. While a DEMS licensee might be able to conduct an interference evaluation with respect to its own nodal station installations, it would not be able to do so with respect to those in neighboring areas. The only way to ensure interference free operation between different licensees would be to conduct frequency coordination. Since the 10 GHz DEMS stations operate on frequencies

which are also authorized for other fixed microwave operation, Teligent's proposal for area wide licensing should not apply to these grandfathered stations.

The NSMA is actively working on methods and procedures for frequency coordination in those areas which presently utilize area wide licensing. This includes both the 38 GHz band and PCS [NSMA Recommendation WG20.97.048, Inter-PCS Co-block Coordination Procedures].

Conclusion

The NSMA is interested in procedures which promote, in an efficient, but effective manner, the exchange of information required for the adequate design and subsequent implementation of communications systems. The NSMA believes its original Comments and these Reply Comments will serve that goal.

Respectfully submitted,

NATIONAL SPECTRUM MANAGERS ASSOCIATION

M. Philip Salas

President - NSMA

Alcatel Network Systems 1225 North Alma Road

Richardson TX 75081-2206

June 8, 1998

CERTIFICATE OF SERVICE

I Katherine M. Falkenthal, hereby certify that on this 15th day of June 1998, I served a copy of the foregoing Reply Comments to be sent by first-class mail, postage prepaid to the following:

Don Farley, Vice President
Durham Communications, Inc.
4611 East Virginia Street
Mesa, Arizona 85215

Harold Mordkofsky John A. Prendergast Richard D. Rubino Blooston, Mordkofsky, Jackson & Dickens 2120 L Street, NW, Suite 300 Washington, DC 20037

John F. Raposa GTE Service Corporation 600 Hidden Ridge, HQE03J27 P.O. Box 152092 Irving, Texas 75015-2092

Andre J. Lachance Mitchell Lazarus 1850 M Street, NW Washington, DC 20036

George Petrutsas Mitchell Lazarus Fletcher, Heald & Hildreth, PLC 1300 North 17th St., 11th Flr Rosslyn, Virginia 22209

Philip L. Verveer
Michael F. Finn
Sophie J. Keefer
Willkie Farr & Gallaher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3384

Mary E. Brooner, Assistant Director Telecommunications Strategy and Regulation Corporate Government Relations Office Motorola, Inc. 1350 I Street, NW, Suite 400 Washington, DC 20005 Timothy R. Graham Joseph M. Sandri, Jr. Barry J. Ohlson Winstar Communications, Inc. 1146 19th Street, NW, Suite 200 Washington, DC 20036

Douglas I. Brandon, Esq. AT&T Wireless Services, Inc. 1150 Connecticut Avenue, NW, 4th Flr. Washington, DC 20036

David C. Jatlow, Esq. Young & Jatlow 2300 N Street, NW, Suite 600 Washington, D.C 20037

Robert M. Gurss WILKES, ARTIS, HEDRICK & LANE, Chartered 1666 K Street, NW #100 Washington, DC 20006

Kevin J. Parrish GMRS Licensee PO Box 22216 San Francisco, CA 94122-0216

Christopher R. Hardy Comsearch 2002 Edmund Halley Drive Reston, VA 20191

Ben H. Lyon Vice Pesident and General Counsel 125 Shoreway Road San Carlos, CA 94070 R. Michael Senkowski Karen Kincaid Eric DeSilva WILEY, REIN & FIELDING 1776 K Street, NW Washington, DC 20006

American Mobile Telecom Assoc., Inc. Alan R. Shark, President 1150 18th Street, NW, Suite 250 Washington, DC 20036

Elizabeth R. Sachs, Esq. Lukas, Nace, Gutierrez & Sachs 1111 19th Street, NW, Suite 1200 Washington, DC 20036

Judith St. Ledger-Roty
Paul G. Madison
Kelley Dryer & Warren LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

William B. Barfield Jim O. Llewellyn 1155 Peachtree Street, NE, Suite 1800 Atlanta, GA 30309-2641

C. Clairborne Barksdale 1100 Peachtree Street, NE, Suite 910 Atlanta, GA 30309-4599

David G. Frolio 1133 21st Street, NW Washington, DC 20036

Carol L. Tacker SBC Wireless, Inc. 17330 Preston Road, Suite 100A Dallas, TX 75252

Kurt A Wimmmer
Alane C. Weixel
Lee J. Tiedrich
COVINGTON & BURLING
1201 Pennsylvania Avenue, NW
Washington, DC 20004

David A. Gross Pamela J. Riley Airtouch Communications 1818 N Street, NW Washington, DC 20036

Joyce H. Jones Airtouch Communications One California Street, 29th Floor San Francisco, CA 94111

Carl W. Northrop E. Ashton Johnston Paul, Hastings, Janofsky & Walker LLP 1299 Pennsylvania Avenue, NW 10th Flr. Washington, DC 20004-2400

Thomas J. Keller
Lisa M. Higginbotham
VERNER, LIIPFERT, BERNHARD,
McPHERSON & HAND, CHARTERED
901-15th Street, NW Suite 700
Washington, DC 20554

Dennis Couillard, Chairman Eric Schimmel, Vice President of TIA 2500 Wilson Boulevard, Suite 300 Arlington, Virginia 22201

Robert M. Lynch SBC Telecommunications, INc. 175 E. Houston, Suite 1250 San Antonio, Texas 78205

Durward D. Dupre SBC Communications, Inc. One Bell Plaza, Suite 3703 Dallas, TX 75202

PCIA
Mark Golden, Vice President of
Regulatory Affairs
500 Montgomery Street, Suite 700
Alexandria, Virginia 22314

Alan S. Tilles, Esquire David E. Weisman, Esquire Meyer, Faller, Weisman & Rosenberg, PC 4400 Jenifer Street, NW #380 Washington, DC 20015 Federal Communications Bar Association R. Clark Wadlow, President Luisa 1. Lancetti Mark D. Schneider William J. Sill, Co Chairs 1722 Eye Street, NW, Suite 300 Washington, DC 20006-3705

Caressa D. Bennet Michael R. Bennet Bennet & Bennet, PLLC 1019 Nineteenth Street, NW, Suite 500 Washington, DC 20036

Jay L. Birnbaum
David H. Pawlik
Jennifer P. Brovey
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, NW
Washington, DC 20005

Chester G. Jones, Chariman AASHTO Special Committee on Comm. 444 N. Capitol Street, NW, Suite 249 Washington, DC 20001

Gregory J. Forrest, P.E. 901 Springfield Drive Walnut Creek, CA 94598

Kerry D. Cochran, President REACT P.O. Box 563 San Bruno, CA 94066

Richard S. Myers
Jay N. Lazrus
Myers Keller Communications Law Group
1522 K Street, NW, Suite 1100
Washington, DC 20005

Robert K. Leef 28826 Paseo Malaga Misson Viejo, CA 92692

Alton G. Silver 2367 Park Stone Drive Charleston, SC 29414

Ronald G. Hilke 1339 Ora Loma Drive Placerville, CA 95667 John T. Scott, III Crowell & Moring LLP 1001 Pennsylvania Avenue, NW Washington, DC 20004

Jeffrey I. Sheldon, General Counsel Thomas E. Goode, Senior Staff Attorney 1140 Connecticut Avenue, NW Suite 1140 Washington, DC 20036

Corwin D. Moore, Jr., Administrative Coordinator Personal Radio Steering Group, Inc. P.O. Box 2851 Ann Arbor, Michigan 48106

M. Philip Salas, President-NSMA Alcatel Network Systems 1225 North Alma Road Richardson, Texas 75081-2206

Christopher D. Imlay, General Counsel BOOTH, FRERET, IMLAY& TEPPER, P.C. 5101 Wisconsin Avenue, NW, Suite 307 Washington, DC 20016

Jonathan Davis 90 Winona Lakes East Stroudsburg, PA 18301

Frederick O. Maia, President The W5YI Group, Inc. 2000 East Randol Mill Road, Suite 608-A Arlington, Texas 76011

Kerry D. Cochran P.O. Box 911 San Bruno, CA 94066-0911

Michael R. Schweizer 755 Mangels Avenue San Francosco, CA 94127-2215

Gary Krystof 10855 Canby Ave. Northridge, CA 91326-2810 Melvin L. Webber 6750 E. Mexico Ave. Denver, CO 80224

Mark S. Rosenthal 5708 Emory Road Uperco, MO 21155

William K. Keane Robin L. Miller Arter & Hadden LLP Suite 400K 1801 K Street, NW Washington, DC 20006

Dr. Michael C. Trahos 4600 King Street, Suite 6K Alexandria, Virginia 22302-1213

Wayne V. Black Nicole B. Donath Keller and Heckman LLP 1001 G. Street, Suite 500 West Washington, DC 20001

James Burtner P.O. Box 3208 Manassas, Virginia 20108

Nickolaus E. Leggett N3NL, Amateur Extra Class Operator 1432 Northgate Square, Apt. 2A Reston, VA 20190-3748

Gary E. Bollschweiler 14514 Biddeford Street Poway, CA 92064

Richard Mendelson 109 Hardy Lane Westbury, NY 11590 David B. Popkin P.O. Box 528 Englewood, NJ 07631-0528

Robert A. Yordan, M.D. 2 Riverdale Drive Cromwell, Connecticut 06416

G.A. Vandercook P.O. Box 14175 Lansing, MI 48901-4175

Bennett Z. Kobb PO Box 4749 Arlington, Virginia 22204-0749

Timothy E. Welch Hill & Welch 1330 New Hampshire Ave., NW, #113 Washington, DC 20036

Randy Davis 9700 S.W. 105th Ave Miami, Florida 33176-2746

Davis Furth Co-Chair, ULS Task Force Wireless Telecommunications Bureau Federal Communications Commission 2025 M Street, NW, Room 5322 Washington, DC 20554

Karin Wrege Co-Chair, ULS Task Force Wireless Telecommunications Bureau Federal Communications Commission 2025 M Street, NW, Room 5202 Washington, DC 20554

International Transcription Services, Inc. 2100 M Street, NW, Suite 140 Washington, DC 20037

Katherine M. Falkenthal